Facility Name: **Ball Container, LLC – Rome Can Plant**
City: Rome
County: Floyd
AIRS #: 04-13-115-00077

Application #: TV-548883
Date Application Received: February 2, 2021
Permit No: 3411-115-0077-V-06-0

Program	Review Engineers	Review Managers
SSPP	Dawn Wu	Jeng-Hon Su
ISMU	Joanna Pecko	Dan McCain
SSCP	Brian Koehler	Kevin Dallmier (Mountain District Office – Cartersville)
Toxics	n/a	n/a
Permitting Program Manager		Stephen Damaske

Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name:

   Ball Container, LLC

2. Parent/Holding Company Name

   Ball Corporation

3. Previous and/or Other Name(s)

   Metal Container Corporation

   (aka) MCC Rome Can Plant

4. Facility Location

   110 Ball Drive
   Rome, Georgia 30161
   Floyd County

5. Attainment, Non-attainment Area Location, or Contributing Area

   Ball Container, LLC (hereinafter "facility") is located in an attainment area.

B. Site Determination

Ball Container, LLC (AIRS# 115-00077) and Ball Packaging, LLC (AIRS# 115-00127) operate under common control, on contiguous property, and under the same two digit SIC Code (i.e., same industrial grouping). The two facilities comprise one site under PSD (i.e., Title I) and Title V of the 1990 Clean Air Act Amendments. This Title V narrative (and associated permit) pertain only to Ball Container, LLC.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3411-115-0077-V-05-0	10/6/2016	Title V Permit Renewal

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
Off-Permit change	2/28/2020	Addition of three spray machines to Line #4 (Emission Unit ID No. IS04 for a total of ten spray machines)
3411-115-0077-V-05-1	5/14/2020	Language update for HAP emission limits and recordkeeping conditions.
Off-Permit change	2/22/2022	Addition of two spray machines to Line #4 (Emission Unit ID No. IS04 for a total of twelve spray machines)

D. Process Description

1. SIC Codes(s)

   3411

   The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

   Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

   The facility manufactures aluminum beverage cans.

3. Overall Facility Process Description

   Aluminum coils are pressed into the shape of cans for use in the beverage industry. The formed cans are then processed through a basecoater/printer, inside spray, and curing ovens, and then formed to accept the traditional aluminum lid. The finished cans are then palletized for shipment to customers.

   The bottle manufacturing has been removed from the permit since the Line was changed from a bottle to a large can line via an off-permit notice email in 10/2018.

4. Overall Process Flow Diagram

   The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The PSD Site (i.e., Title I Site) is a major source under the PSD/NSR regulations for VOC emissions. Each facility that comprises the Title I Site operates under a VOC emissions limitation of less than 250 tons during any consecutive twelve-month period.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			✓
PM_{10}	Yes			✓
$PM_{2.5}$	Yes			✓
SO_2	Yes			✓
VOC	Yes	✓		
NO_x	Yes			✓
CO	Yes			✓
TRS	No			
H_2S	No			
Individual HAP	Yes		✓	
Total HAPs	Yes		✓	

3. MACT Standards

40 CFR 63, Subpart KKKK – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans regulation would be applicable to this facility, however the facility has chosen to limit the HAP emissions from the Title V Site in order to avoid major source status, and therefore, it is not subject to the regulation.

40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters regulation would be applicable to the boiler HW01, however the Title V Site has chosen to limit the HAP emissions from the facility in order to avoid major source status, and therefore, the boiler HW01 is not subject to the regulation.

40 CFR 63, Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources regulation would be applicable to the boiler HW01, however the boiler HW01 is permitted to only combust natural gas, therefore the boiler HW01 is not subject to the regulation.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	n
Program Code 8 – Part 61 NESHAP	n
Program Code 9 - NSPS	y
Program Code M – Part 63 NESHAP	n
Program Code V – Title V	y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

Volatile Organic Compound (VOC) emissions are limited to less than 250 tons per year to avoid major PSD source status, and therefore, it is not subject to PSD regulation. This emissions limit applies strictly to this facility.

The facility chose to limit HAP emissions to 10 tons per year of any single HAP and 25 tons per year of any combination of HAPs. This emissions limit applies on a combined basis to Ball Container, LLC (AIRS # 115-00077) and Ball Packaging, LLC (AIRS# 115-00127) and this fact is clarified in the updated Title V Renewal Permit for Ball Container, LLC. This limit was taken in avoidance of the MACT standard for can coating, 40 CFR 63, Subpart KKKK and DDDDD.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility has not indicated any non-compliance issues in the Title V Application.

D. Permit Conditions

Condition 2.1.1 limits the VOC emissions from the facility to less than 250 tons per year.

Condition 2.1.2 limits the HAP emissions from the facility to less than 10 tons per year of any single HAP and 25 tons per year of any combination of HAPs. Condition 2.1.2 was modified in Permit Amendment No. 3411-115-0077-V-05-1 to include both Ball Packaging, LLC and Ball Container, LLC – Rome Can Plant into the HAP emission limit.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
HW01	Boiler No. 1, 14MMBtu/hr Burn natural gas	391-3-1-.02(2)(g) 391-3-1-.02(2)(d)	N/A	None
BC21	Basecoater No. 21 (Line 2)	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(u)	N/A	None
BO21	Basecoater Oven No. 21 (Line 2)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g).	TO1A	Thermal Oxidizer
BC22	Basecoater No. 22 (Line 2)	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(u)	N/A	None
BO22	Basecoater Oven No. 22 (Line 2)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO1A	Thermal Oxidizer
P11	Printer No. 11 (Line 1)	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(u)	N/A	None
PO11	Pin Oven No. 11 (Line 1)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO1A	Thermal Oxidizer
P12	Printer Process No. 12 (Line 1)	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(u)	N/A	None
PO12	Pin Oven No. 12 (Line 1)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO1A	Thermal Oxidizer
IBO1	Inside Bake Oven (Line 1)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO1A	Thermal Oxidizer
IS01	Inside Spray Machine Bank No. 1 (Line 1) and Associated Process Equipment	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(u)	TO1A	Thermal Oxidizer
			BH1	Baghouse #1
CB01	Can Bodymaker & Trimmer L1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	ME01	Oil Mist Eliminator Line #1
			SC01	Scrap Cyclone
P21	Printer Process No. 21 (Line 2)	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(u)	N/A	None
PO21	Pin Oven No. 21 (Line 2)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO1A	Thermal Oxidizer
P22	Printer Process No. 22 (Line 2)	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(u)	N/A	None
PO22	Pin Oven No. 22 (Line 2)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO1A	Thermal Oxidizer
IBO2	Inside Bake Oven (Line 2)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO1A	Thermal Oxidizer
IS02	Inside Spray Machine Bank No. 2 (Line 2) and Associated Process Equipment	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(u)	TO1A	Thermal Oxidizer
			BH2	Baghouse #2
CB02	Can Bodymaker & Trimmer L2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	ME02	Oil Mist Eliminator Line #2
			SC01	Scrap Cyclone
P31	Printer Process No. 31 (Line 3)	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(u)	TO1A	Thermal Oxidizer

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
PO31	Pin Oven No. 31 (Line 3)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	BH2	Baghouse #2
P32	Printer Process No. 32 (Line 3)	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(u)	ME02	Oil Mist Eliminator Line #2
PO32	Pin Oven No. 32 (Line 3)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	SC01	Scrap Cyclone
IBO3	Inside Bake Oven (Line 3)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO1A	Thermal Oxidizer
IS03	Inside Spray Machine Bank No. 3 (Line 3) and Associated Process Equipment	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(u)	TO1A	Thermal Oxidizer
			BH3	Baghouse #3
CB03	Can Bodymaker & Trimmer L3	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	ME03	Oil Mist Eliminator Line #3
			SC01	Scrap Cyclone
P41	Printer Process No. 41 (Line 4)	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(u)	N/A	None
PO41	Pin Oven No. 41 (Line 4)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO2A	Thermal Oxidizer
P42	Printer Process No. 42	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(u)	N/A	None
PO42	Pin Oven No. 42 (Line 4)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO2A	Thermal Oxidizer
IBO4	Inside Bake Oven (Line 4)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	TO2A	Thermal Oxidizer
ISO4	Inside Spray Machines Bank No. 4 (Line 4)	40 CFR Part 60 Subpart WW 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(u)	TO2A	Thermal Oxidizer
			BH4	Baghouse #4
CB04	Can Bodymaker & Trimmer L4 (Line 4)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	ME04	Oil Mist Eliminator Line #4
			SC04	Scrap Cyclone
SCA	Solvent Cleanup Activities	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
LS01	Lime Silo No. 1	None applicable.	N/A	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

In the email of February 7, 2023, the facility indicated that they have not run propane as a backup in 10 or more years and have sold the propane and tanks to a propane distributor, and they are in the process of decommissioning that system. Therefore, the facility requested EPD remove propane and propane vaporizer references from this permit renewal.

B. Equipment & Rule Applicability

Emission and Operating Caps:

None applicable.

Rules and Regulations Assessment:

Georgia Rule 391-3-1-.02(2)(b) – Rule (b) provides opacity limits for point sources of particulate matter emissions.

Georgia Rule 391-3-1-.02(2)(d) applies to all fuel burning equipment. The rule requires that all fuel burning equipment meet a particulate matter standard and opacity standard. The facility is only permitted to burn only natural gas and therefore will not violate this standard.

Georgia Rule 391-3-1-.02(2)(e) – Rule (e) provides general particulate matter emission limits for particulate-generating sources, based on input weight rate.

Georgia Rule 391-3-1-.02(2)(g) applies to all fuel burning sources. The rule requires that all fuel burning sources below 100 million BTU's of heat input per hour shall not burn fuel containing more than 2.5 percent sulfur, by weight. The facility is only permitted to burn only natural gas and therefore will not violate this standard.

Georgia Rule 391-3-1-.02(2)(u) applies to this facility for the following reasons: (1) facility is permitted with a VOC emissions limit greater than 100 tons per year; and (2) operates can coating using coating operations defined in Georgia Rule 391-3-1-.02(2)(u)3. The rule specifies that VOC emissions are limited to 4.2 pounds per gallon of coating, excluding water, delivered to the coating applicator of the interior spray operations, and 2.80 pounds per gallon of coating, excluding water, delivered to the coating applicator of the varnish, the overvarnish and the exterior operations. VOC emissions are limited to 2.80 pounds per gallons of coating, excluding water, from overvarnishing operations and two-piece can exterior (basecoat and overvarnish) operations per Georgia Rule (u)1.(i). Georgia Rule (u)1.(i) establishes a solids equivalent limit of 4.52 pounds VOC per gallon of coating solids delivered to the coating applicator. The solids equivalent limit applies in cases where the coating applicator applies a coating with more than 2.80 pounds per gallon of coating excluding water.

VOC emissions are limited to 4.2 pounds per gallon of coating, excluding water, delivered to the coating applicator from two-piece can exterior end (spray and roll coat) operations or three-piece can interior body spray applications, per Georgia Rule 391-3-1-.02(2)(u)1.(ii). Georgia Rule (u)1.(ii) establishes a solids equivalent limit of 9.78 pounds VOC per gallon of coating solids delivered to the coating applicator. The solids equivalent limit applies in cases where the coating applicator applies a coating with more than 4.2 pounds per gallon of coating excluding water.

The minimum VOC destruction removal efficiency (DRE) is set at 90%, per Georgia Rule (u)2.(iii) and this numerical value is subsumed by the VOC DRE for PSD Avoidance purposes of 95%.

40 CFR Part 60 Subpart WW applies to each exterior base coat operation, each overvarnish coating operation, and each inside spray coating operation in beverage can surface coating lines that were constructed, modified, or reconstructed after November 26, 1980. The rule specifies that VOC emissions are also limited to 0.29 kilograms per liter of coating solids from each two-piece can exterior base coating operation except clear base coat, 0.46 kilograms per liter of coating solids from each two-piece can clear base coating operation and from each overvarnish coating operation; and 0.89 kilograms per liter of coating solids from each two-piece can inside spray coating operation. NSPS WW allows for the following compliance options: (1) VOC content of the coatings per 40 CFR 60.493(b)(1) or (2) use of a capture system and control device.

C. Permit Conditions

Condition 3.2.1 requires all fuel burning sources onsite fire natural gas only. For Boiler HW01, this is required to avoid being subject to 40 CFR 63 Subpart JJJJJJ.

Condition 3.3.1 states the VOC emissions limits for coating operations in 40 CFR Part 60 Subpart WW.

Condition 3.4.1 states Rule (b) which provides opacity limits.

Condition 3.4.2 states Rule (e) which provides general particulate matter emission limits

Condition 3.4.3 states particulate matter emission standard and opacity standard for the boiler HW01 in Georgia Rule 391-3-1-.02(2)(d).

Condition 3.4.4 states the sulfur standard for the fuel-burning sources in Georgia Rule 391-3-1-.02(2)(g).

Condition 3.4.5 establishes the VOC emissions standards for can coating operations per Georgia Rule(u)1. The condition language has been updated to better match the state rule.

Condition 3.4.6 establishes the various compliance mechanisms for determining compliance with Georgia Rule(u)2.

Condition 3.4.7 states the operation standard for Thermal Oxidizers TO1A and TO2A for purposes of PSD Avoidance for the facility. The condition has been modified to reflect the performance test data received from the most recent performance tests.

The facility tested the thermal oxidizer TO01 on August 16, 1999 at a temperature of 1350°F achieving a destruction efficiency of 95 percent, therefore this minimum temperature is included in the Title V Permit No. 3411-115-0077-V-01-0 (Dated October 18, 2000) rather than a setpoint in order to assure that a minimum destruction efficiency is met. When the 3 hour average combustion temperature falls below 1350°F, it is considered a monitoring excursion. The most recent performance tests for TO1A on April 11, 2019 and TO2A on October 15, 2020 indicate that the minimum combustion zone temperature in each RTO has changed.

Conditions 3.5.1 and 3.5.2 state the control equipment requirements in Georgia Rule 391-3-1-.02(2)(c).

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Condition 4.2.1 requires that the facility to conduct VOC destruction efficiency test on the regenerative thermal oxidizers TO1A and TO2A at approximately 5-year intervals. The results of said testing are used to verify compliance with the following: (1) Georgia Rule (u) when complying with Georgia Rule (u)2.(iii); (2) 40 CFR 60.495(3); and/or (3) PSD Avoidance for VOC emissions from the facility.

Conditions 4.2.2 and 4.2.3 have been removed since the facility conducted the initial capture and destruction efficiency test on October 15, 2020 for the regenerative thermal oxidizer TO2A.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 requires the facility to install, calibrate, maintain, and operate devices that continuously monitor the combustion zone temperature of the thermal oxidizers (Emission Unit ID Nos. TO1A and TO2A). The average combustion zone temperatures of the thermal oxidizers is used to identify an excursion associated with the VOC DRE for purposes of Georgia Rule (u), NSPS WW, and PSD Avoidance purposes.

C. Compliance Assurance Monitoring (CAM)

An emission unit is subject to the provisions of 40 CFR 64, "Compliance Assurance Monitoring" because:

- It is located at a major source that is required to obtain a Title V Permit. [§64.2(a)]
- It is subject to an emission limitation or standard for the applicable pollutant. [§64.2(a)(1)]
- The facility uses a control device to achieve compliance. [§64.2(a)(2)]
- Potential pre-controlled emissions of the applicable pollutant (particulate matter) from such emission unit are at least 100 percent of major source threshold. [§64.2(a)(3)]

<u>CAM Applicability for Thermal Oxidizer</u>
The facility is subject to CAM because it used control device comply with the 250 ton per year VOC PSD Avoidance limit and/or Georgia Rule (u) and the potential pre-controlled emissions are equal to or greater than 100 tons per year. The units subject to CAM include the Basecoat Operations (ID Nos. BO21, BO22), Printers (ID Nos. PO11, PO12, PO21, PO22, PO31, PO32, and PO41), and Inside Spray/Baking Operations (ID Nos. IBO1, IS01, IBO2, IBO3, and IBO4). No revisions to existing CAM requirements for the thermal oxidizers are required.

<u>CAM Applicability for Baghouses (BH1, BH2, BH3, and BH4)</u>
The facility operates baghouse BH1 as control device for Inside Spray Machine Bank No. 1 (ID No. IS01) to provide a reasonable assurance of compliance with Georgia Rule (e). Pre-controlled PM emissions are less than 100 tpy. Therefore, CAM is not applicable to IS01 and BH1.

The facility operates baghouse BH2 as control device for Inside Spray Machine Bank No. 2 (ID No. IS02) and Pine Oven No. 31 (ID No. PO31) to provide a reasonable assurance of compliance with Georgia Rule (e). Pre-controlled PM emissions are less than 100 tpy. Therefore, CAM is not applicable to IS02/PO31 and BH2.

The facility operates baghouse BH3 as control device for Inside Spray Machine Bank No. 3 (ID No. IS03) to provide a reasonable assurance of compliance with Georgia Rule (e). Pre-controlled PM emissions are less than 100 tpy. Therefore, CAM is not applicable to IS03 and BH3.

The facility operates baghouse BH4 as control device for Inside Spray Machine Bank No. 4 (ID No. IS04) to provide a reasonable assurance of compliance with Georgia Rule (e). Pre-controlled PM emissions are less than 100 tpy. Therefore, CAM is not applicable to IS04 and BH4.

CAM Applicability for Mist Eliminators (ME01, ME02, ME03, and ME04)

The facility operates mist eliminator ME01 as control device for Can Bodymaker & Trimmer L1 (ID No. CB01) to provide a reasonable assurance of compliance with Georgia Rule (e). Pre-controlled PM emissions are less than 100 tpy. Therefore, CAM is not applicable to CB01 and ME01.

The facility operates mist eliminator ME02 as control device for Can Bodymaker & Trimmer L2 (ID No. CB02) and Printer Process No. 32 (Line 3) to provide a reasonable assurance of compliance with Georgia Rule (e). Pre-controlled PM emissions are less than 100 tpy. Therefore, CAM is not applicable to CB02/P32 and ME02.

The facility operates mist eliminator ME03 as control device for Can Bodymaker & Trimmer L3 (ID No. CB03) to provide a reasonable assurance of compliance with Georgia Rule (e). Pre-controlled PM emissions are less than 100 tpy. Therefore, CAM is not applicable to CB03 and ME03.

The facility operates mist eliminator ME04 as control device for Can Bodymaker & Trimmer L1 (ID No. CB04) to provide a reasonable assurance of compliance with Georgia Rule (e). Pre-controlled PM emissions are less than 100 tpy. Therefore, CAM is not applicable to CB04 and ME04.

CAM Applicability for Cyclones (SC01 and SC04)

The facility operates cyclone SC01 as control device for Can Bodymaker & Trimmers L1, L2 & L3 and Pin Oven No. 32 (ID Nos. CB01, CB02, CB03 and PO32) to provide a reasonable assurance of compliance with Georgia Rule (e). Pre-controlled PM emissions are less than 100 tpy. Therefore, CAM is not applicable to CB01/CB02/CB03/PO32 and SC01.

The facility operates cyclone SC04 as control device for Can Bodymaker & Trimmer L4 (ID No. CB04) to provide a reasonable assurance of compliance with Georgia Rule (e). Pre-controlled PM emissions are less than 100 tpy. Therefore, CAM is not applicable to CB04 and SC04.

Condition 5.2.2 indicates the specific operations that are subject to the provisions of 40 CFR 64, “Compliance Assurance Monitoring”.

Condition 5.2.3 indicates the operating parameters and criteria that the facility’s control equipment must meet in order to satisfy the requirements of 40 CFR 64, “Compliance Assurance Monitoring”.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.1.7b.i. defines an exceedance associated with the facility-wide PSD VOC emissions limit for Condition 2.1.1.

Condition 6.1.7b.ii. defines an exceedance associated with the Title V Site individual and total HAP emissions limit.

Condition 6.1.7b.iii.-v. defines an exceedance associated with NSPS WW.

Condition 6.1.7b.vi. and vii. defines an exceedance associated with Georgia Rule (u).

Condition 6.1.7c.i. defines an excursion associated with operation of the thermal oxidizers associated with Georgia Rule (u), NSPS WW, and/or PSD Avoidance for VOC emissions.

Condition 6.1.7c.ii. defines an excursion associated with fuel type restrictions.

Conditions 6.2.1 – 6.2.3 state the recordkeeping, and monthly and yearly reporting requirements for the 250 tpy VOC limit.

Condition 6.2.4 states the recordkeeping requirements for 40 CFR Part 60 Subpart WW and Georgia Rule 391-3-1-.02(2)(u).

Conditions 6.2.5 – 6.2.7 state the recordkeeping, and monthly and yearly reporting requirements for the 10/25 HAP limits. Conditions 6.2.5, 6.2.6, and 6.2.7 were modified in Permit Amendment No. 3411-115-0077-V-05-1 to include both Ball Packaging, LLC and Ball Container, LLC – Rome Can Plant for the HAP recordkeeping.

Condition 6.2.8 states the reporting requirements as stated in 40 CFR Part 60 Subpart WW.

Existing Condition 6.2.9 has been removed since the new thermal oxidizer TO2A has been activated on August 7, 2020.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

Not Applicable.

E. Short-Term Activities

Not Applicable.

F. Compliance Schedule/Progress Reports

Not Applicable.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Stratospheric Ozone Protection Requirements

Not Applicable.

J. Pollution Prevention

Not Applicable.

K. Specific Conditions

Not Applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//